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PRACTICE IN THE AREA OF EMPLOYMENT AND LABOR LAW

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**VIA ECF**

Vernon S. Broderick, United States District Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 518  
New York, New York 10007

May 6, 2020

**Re: Rafael Sanchez v. R.Q. Realty Mgt. Ltd. and Raul Quiroz  
Case No. 19-cv-05599 (VSB) – Request for Extension of Discovery Deadline**

Dear Judge Broderick:

We represent Defendants in the above-referenced matter. The parties jointly submit this request seeking a 90-day extension of the current discovery deadlines from May 8, 2020 to August 7, 2020. Discovery has been hampered by a number of issues. On Plaintiff's side, Plaintiff's counsel was ill for much of April and has been caring for three young children, including a 15-month-old, since he began quarantine in early March due to exposure to COVID-19. Further, the parties will be unable to perform depositions remotely while sheltering at home given Plaintiff's counsel's responsibilities at home. Tragically, Robert D. Lipman, my law partner and Defendants' co-counsel in this matter, recently passed away due to the pandemic. It will now take some time to recover from this tremendous loss so that the case can proceed in an efficient manner. There have been no prior requests for an extension of the discovery deadlines. We also request that the post discovery conference currently scheduled for May 29, 2020 be adjourned to a date after discovery has been completed.

Thank you.

Very truly yours,

/s/

David A. Robins

cc: Michael Taubenfeld, Esq. (via ECF)